

# **Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

1. Date filed: February 17, 2012
2. Name of company(s) covered by this certification: GAW High-Speed Internet, Inc.
3. Form 499 Filer ID: 26-4689623
4. Name of signatory: Homero J. Garza
5. Title of signatory: CEO
6. Certification:

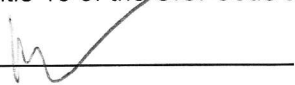
I, Homero J. Garza, certify that I am an officer of GAW High-Speed Internet, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:** Accompanying Statement explaining CPNI procedures

## STATEMENT EXPLAINING CPNI PROCEDURES

GAW High-Speed Internet, Inc. ("GAW") takes very seriously the security of CPNI. The company has the following security measures in place to protect CPNI data from unauthorized access:

**Telephone access.** GAW does not disclose any of its customers' call detail information or other CPNI data over the telephone, regardless of whether its customers have initiated the telephone contact.

**Online access.** GAW's web portal is password protected and encrypted to allow customers to view only their personal information.

**In-store access.** GAW does not have any retail locations and therefore does not provide in-store access to CPNI data.

GAW trains its personnel as to when they are and are not authorized to use CPNI. GAW employees are subject to strict disciplinary measures for misuse or mishandling of CPNI.

GAW receives all CPNI data directly from local exchange carriers, pursuant to its interconnection agreements with these entities, solely for the purpose of billing its customers. CPNI is used only in the following manner:

**Billing purposes.** GAW has engaged an independent contractor to perform billing services that are necessary to the provision of service to GAW's customers. GAW shares CPNI data with its billing agent only to the extent necessary for generating bills for its customers. All such disclosure of CPNI data is subject to a mutual confidentiality provision contained in the agreement between GAW and its billing agent.

**Marketing or other purposes.** GAW does not engage in any marketing campaigns which utilize CPNI data and does not sell CPNI data. Except for billing purposes as described above, GAW does not release any CPNI data to any third party or agent, including joint venture partners or independent contractors, without an affirmative written request by the customer.